

1 MELANIE A. HILL  
2 Nevada Bar No. 8796  
3 **MELANIE HILL LAW PLLC**  
4 1925 Village Center Circle, Ste. 150  
5 Las Vegas, Nevada 89134  
6 Tel: (702) 362-8500  
7 Fax: (702) 362-8505  
8 Email: [Melanie@MelanieHillLaw.com](mailto:Melanie@MelanieHillLaw.com)  
9 *Attorneys for Plaintiff Augustine Calleros, Jr.*

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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 AUGUSTINE CALLEROS, JR.,

14 Plaintiff,

15 vs.

16 CITY OF NORTH LAS VEGAS, a municipal  
17 corporation,

18 Defendant.

CASE NO.: 2:23-cv-01340-GMN-DJA

**STIPULATION TO EXTEND DEADLINES  
TO RESPOND AND REPLY TO  
DEFENDANT’S MOTION FOR  
SUMMARY JUDGMENT [ECF No. 44]**

(Fourth Request)

19 Plaintiff, Augustine Calleros, Jr. (“Calleros”), by and through his counsel, Melanie Hill Law,  
20 and Defendant City of North Las Vegas (“CNLV”), by and through its counsel, Madison Zornes-Vela,  
21 hereby stipulate to extend the deadline for Mr. Calleros to respond to Defendant’s Motion for Summary  
22 Judgment filed on August 28, 2024 [ECF No. 44] from the current deadline of November 21, 2024 up  
23 to and including November 25, 2024. The parties further stipulate to extend the deadline for CNLV to  
24 reply in support of its Motion for Summary Judgment from the current deadline of December 9, 2024  
25 up to and including December 16, 2024. This Stipulation is made at the request of Plaintiff’s counsel  
26 for the reasons set forth herein. This is the fourth request to extend the deadline to respond to this  
27 dispositive motion.

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1 In support of this Stipulation and Order, the parties state as follows:

2 1. The current deadline for Plaintiff to respond to the Defendant's Motion for Summary  
3 Judgment filed on August 28, 2024 [ECF No. 44] is November 21, 2024. The parties have agreed to a  
4 fourth extension of the deadline from the current deadline of November 21, 2024 until November 25,  
5 2024.

6 2. Counsel for Plaintiff reached out to counsel for Defendant requesting an additional two court  
7 day extension of the response deadline due to Plaintiff's counsel's illness that formed the basis on the  
8 third stipulation because it continued through this morning and kept counsel out of the office this week.  
9 Defendant's counsel agreed to the requested extension. Counsel for Plaintiff also offered to extend the  
10 CNLV's reply deadline due to the upcoming Thanksgiving holiday next week and the parties agreed to  
11 a 21-day extension of the reply deadline until December 16, 2024.  
12

13 3. This stipulation to extend the dispositive motion deadlines is brought in good faith, with a  
14 showing of good cause, and is not sought for any improper purpose or other purpose of delay, but to  
15 allow counsel for the Plaintiff the additional time requested to respond to the dispositive motion  
16 considering the issues she has described herein constituting good cause for the short extension.  
17

18 WHEREFORE, the parties respectfully request by this stipulation that the Court extend the  
19 deadline for Mr. Calleros to respond to Defendant's Motion for Summary Judgment filed on August  
20 28, 2024 [ECF No. 44] from the current deadline of November 21, 2024 to November 25, 2024.  
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1 The parties further respectfully request that the Court extend the deadline for Defendant to file  
2 its reply from the current deadline of December 9, 2024 up to and including December 16, 2024.

3 DATED this 21st day of November, 2024.

4  
5 Respectfully submitted,

6 MELANIE HILL LAW PLLC

7 /s/ Melanie Hill

8  
9 Melanie A. Hill, Esq. (NV Bar No. 8796)

10 1925 Village Center Circle, Suite 150

11 Las Vegas, NV 89134

12 Tel.: (702) 362-8500

13 *Attorney for Plaintiff Augustine Calleros, Jr.*

Respectfully submitted,

NORTH LAS VEGAS CITY ATTORNEY

/s/ Madison Zornes-Vela

Madison Zornes-Vela, Esq. (NV Bar No. 13626)


2250 Las Vegas Blvd., N., Suite 810

North Las Vegas, Nevada 89030

Tel: (702) 633-1057

*Attorney for Defendant City of North Las Vegas*

14  
15 IT IS SO ORDERED:

16   
GLORIA M. NAVARRO

17 UNITED STATES DISTRICT JUDGE

18 Dated: November 22, 2024.